



NIXON PEABODY LLP
ATTORNEYS AT LAW

NIXONPEABODY.COM
@NIXONPEABODYLLP

Daniel A. Schnapp
Partner
T 212-940-3026
dschnapp@nixonpeabody.com

Tower 46
55 West 46th Street
New York, NY 10036-4120
212-940-3000

March 15, 2021

Hon. Jesse M. Furman
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: Ibrahim Mizrahi Case No. 18-CR-889 (JMF), USM Number 86309-054

Dear Judge Furman:

We are writing on behalf of our client, Mr. Ibrahim Mizrahi, to respectfully request a 60-day extension of his March 24, 2021 voluntary surrender date to CI Moshannon Valley so that he may be permitted to receive the COVID-19 vaccination prior to surrendering.

The Government opposes this request, but has informed undersigned counsel that it does not intend to file a new opposition in response to this request. Despite the Government's position, we maintain that another extension is warranted given present circumstances.

Due to his heightened vulnerability to COVID-19, Mr. Mizrahi was recently able to schedule a COVID-19 vaccination appointment for April 14, 2021 at SUNY Binghamton in Johnson City, New York. *See* New York State COVID Vaccine Appointment Confirmation (attached hereto as **Exhibit 1**). Although he continues to search for an earlier appointment, this is the earliest available appointment that Mr. Mizrahi has been able to obtain at this time.

Following his initial dose, Mr. Mizrahi anticipates that he will be scheduled to receive a second dose of the vaccine approximately 21 days after his April 14, 2021 appointment. Once vaccinated, the CDC has advised that people are not considered protected from COVID-19 until fourteen days after they have received the second dose. *See Key Things to Know About the COVID-19 Vaccines*, CDC (Mar. 8, 2021), <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/keythingstoknow.html>.

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As this Court has previously recognized, there remains a clear “public health interest in not adding to the prison population at this time.” Dkt. 87. We therefore respectfully request that this Court extend Mr. Mizrahi’s voluntary surrender date by 60 days from March 24, 2021 to allow Mr. Mizrahi to be fully vaccinated prior to his surrender. This extension will serve the best interest of the public welfare, Mr. Mizrahi, and other inmates in federal prisons. Notably, Counsel anticipates that this will be the final extension as, at the end of the 60 days, Mr. Mizrahi will be fully vaccinated.

Sincerely,

/s/ Daniel A. Schnapp

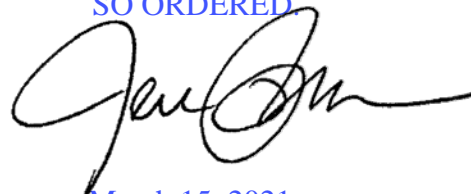
Daniel A. Schnapp
Partner

DAS

cc: All counsel by ECF

Application GRANTED. No further extensions are likely to be granted for the reasons acknowledged by counsel. The Clerk of Court is directed to terminate ECF No. 92.

SO ORDERED



March 15, 2021